

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006:

Docket No. R2006-1

**INTERROGATORY DIRECTED BY THE McGRAW-HILL COMPANIES, INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
MH/USPS-T42-6**

Pursuant to Rules 25, 26 and 27 of the Rules of Practice, The McGraw-Hill Companies, Inc. directs the accompanying follow-up interrogatory to United States Postal Service witness Marc D. McCrery (USPS-T-42). To the extent that the witness is unable to provide a full response, please provide a response by the witness best able to respond or by the Postal Service as an institution. If the information requested is not available in the precise format or level of detail requested, please provide responsive information in such format and level of detail as is available. In the event that the Postal Service would otherwise object to any of these discovery requests, please first contact the undersigned counsel to discuss whether the objection may be resolved informally.

Respectfully submitted,

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MH/USPS-T42-6. Please refer to your response to MH/USPS-T42-4, and to the publicly-accessible reports at <http://www.redtag.org/redtag/usps/init.asp>. Please confirm the following. If you are unable to confirm, please explain fully and specifically and provide your alternative calculations.

(a) The Delivery Breakdown Reports by Origin Entry Point reported the following percentages of 4-plus days late delivery for 53 weekly publications (“totals” for all entry points):

August 2005 report:	9%
September 2005 report:	11%
October 2005 report:	12%
November 2005 report:	14%
December 2005 report:	12%
January 2006 report:	15%
February 2006 report:	12%
March 2006 report:	10%
April 2006 report:	11%
May 2006 report:	10%
June 2006 report:	11%
July 2006 report:	13%

(b) The average percentage of 4-plus days late delivery for the 53 weekly publications that is reflected in the above reports taken as a whole is 11.66%.

(c) The Delivery Breakdown Reports by Destination Zip Code District, by Destination 3-Digit Zip Code, and by Destination 5-Digit Zip Code, respectively, each report the same percentages of 4-plus days late delivery for the 53 weekly publications over the same time period.

(d) The Percentage On Time Reports by Origin Entry Point report the following “on time” delivery percentages (each corresponding to a particular week or day(s)) for 53 weekly publications (“totals” for all entry points):

August 2005 report:	66%, 59%, 59%, 61%, 57% (average: 60.4%)
September 2005 report:	62%, 46%, 55%, 58%, 61% (average: 56.4%)
October 2005 report:	53%, 57%, 57%, 53%, 58%, 57% (ave. 55.6%)
November 2005 report:	63%, 57%, 51%, 51%, 53% (average: 55%)
December 2005 report:	35%, 50%, 56%, 59%, 50% (average: 50.8%)
January 2006 report:	36%, 50%, 53%, 55%, 56% (average: 50%)
February 2006 report:	60%, 54%, 54%, 52%, 52% (average: 54.4%)
March 2006 report:	61%, 54%, 55%, 59%, 57% (average: 57.2%)
April 2006 report:	49%, 57%, 56%, 55%, 55% (average: 54.4%)
May 2006 report:	56%, 58%, 56%, 58%, 54% (average: 56.4%)
June 2006 report:	58%, 57%, 56%, 58%, 57% (average: 57.2%)
July 2006 report:	51%, 52%, 45%, 52%, 56%, 64% (ave. 62%)

(e) The average percentage of on time delivery for the 53 weekly publications that is reflected in the above reports taken as a whole is 55.73%

(f) The Percentage On Time Reports by Destination Zip Code District, and by Destination 3-Digit Zip Code, respectively, each report essentially the same on time delivery percentages for the 53 weekly publications over the same time period.